



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2025 Grand Jury
2:25-CR-00123-AB

UNITED STATES OF AMERICA,

CR No. 25-

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. § 1956(h): Conspiracy
to Commit Money Laundering; 18
U.S.C. § 982: Criminal Forfeiture]

SYLAS NYUYDZENE VERDZEKOV,
MUSTAPHA NKACHIWOOU SELLY
YAMIE,
aka "Mustapha Selly Yamie,"
aka "Mustapha Sellyyamie,"
aka "Mustapha Yamieselly,"
and
LOVERT CHE,

Defendants.

The Grand Jury charges:

[18 U.S.C. § 1956(h)]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Defendant SYLAS NYUYDZENE VERDZEKOV lived in Chino Hills,
California.

1 2. Defendant MUSTAPHA NKACHIWOOU SELLY YAMIE, also known as
2 ("aka") "Mustapha Selly Yamie," aka "Mustapha Sellyyamie," aka
3 "Mustapha Yamieselly," lived in Inglewood, California.

4 3. Defendant LOVERT CHE lived in Lomita, California.

5 4. Victim Business 1 was a law firm based in Naples, Florida.

6 5. Victim Business 2 was a law firm based in Coral Springs,
7 Florida.

8 6. One type of elder fraud scam was a fraudulent scheme in
9 which an elderly victim was targeted by one or more imposters
10 purporting to be representatives of internet companies or banks.
11 Using false pretenses, representations, and promises, the imposter
12 would deceive the victim into believing that the victim's bank
13 account had been compromised and would trick the victim into sending
14 money by interstate wire or check to the imposter, under false
15 pretenses.

16 7. One type of "real estate" scam was a fraudulent scheme in
17 which an imposter would pretend to act as a purported seller of real
18 property. In fact, the purported seller was not the actual owner of
19 the property and had no authority to sell it. Using false pretenses,
20 representations, and promises, the imposter would deceive a victim
21 into believing that they were entering into a legitimate sale of the
22 property and would trick the victim into sending money by interstate
23 wire or mailing a check to the imposter, under false pretenses.

24 8. Synthetic identities were false identities created using
25 certain personally identifiable information, such as names, dates of
26 birth, and social security numbers, that typically consisted of a
27 combination of stolen and fictitious information. Synthetic

1 identities could be used to create false business names and entities
2 (i.e., "shell companies").

3 B. THE OBJECT OF THE CONSPIRACY

4 9. Beginning on a date unknown, but no later than on or about
5 November 30, 2021, and continuing to the present, in Los Angeles
6 County, within the Central District of California, and elsewhere,
7 defendants VERDZEKOV, YAMIE, and CHE (collectively, "defendants")
8 conspired and agreed with one another and others known and unknown to
9 the Grand Jury to knowingly and intentionally commit an offense
10 against the United States, namely, money laundering, in violation of
11 Title 18, United States Code, Section 1956(a)(1)(B)(i), by conducting
12 and attempting to conduct financial transactions affecting interstate
13 and foreign commerce with the intent to conceal and disguise the
14 nature, location, source, ownership, and control of the proceeds of
15 some form of specified unlawful activity, namely, mail fraud, in
16 violation of Title 18, United States Code, Section 1341 and wire
17 fraud, in violation of Title 18, United States Code, Section 1343.

18 C. THE MANNER AND MEANS OF THE CONSPIRACY

19 10. The object of the conspiracy was to be carried out, and was
20 carried out, in substance, as follows:

21 a. Defendants and their co-conspirators would obtain or
22 create fake identification documents, including passports and
23 driver's licenses, using synthetic identities.

24 b. Defendants and their co-conspirators would use the
25 fake identification documents to incorporate over 36 shell companies
26 in the State of California. These shell companies did not conduct
27 legitimate business and were incorporated to further defendants'
28 crimes.

1 c. Defendants and their co-conspirators would also open
2 at least 145 bank accounts and at least 32 private mailboxes under
3 the names of synthetic identities or the shell companies.

4 d. Defendants and their co-conspirators would then cause
5 the proceeds of elder fraud scams, real estate scams, and other fraud
6 schemes conducted by co-conspirators to be sent by the victims, by
7 means including interstate wires and mailings, to private mailboxes
8 and bank accounts that defendants controlled.

9 e. Defendants would deposit the funds from victims into
10 bank accounts they controlled and that they opened under synthetic
11 identities and shell companies, knowing and intending that such
12 deposits would conceal or disguise the nature, location, source,
13 ownership, or control of the funds.

14 f. Once the funds were received into those accounts,
15 defendants would quickly transfer a substantial portion of those
16 funds, including through wires to other accounts defendants
17 controlled or mobile payments such as Zelle, and would make large
18 cash withdrawals in order to use the stolen funds on expenses for
19 their own personal benefit.

20 11. In total, defendants laundered at least approximately \$10
21 million in funds provided by at least approximately 100 victims of
22 elder fraud scams, real estate scams, and other fraud schemes.

23 D. OVERT ACTS

24 12. In furtherance of the conspiracy, and to accomplish its
25 object, defendants VERDZEKOV, YAMIE, and CHE, together with others
26 known and unknown to the Grand Jury, on or about the following dates,
27 committed and willfully caused others to commit the following overt
28

1 acts, among others, within the Central District of California and
 2 elsewhere:

3 **Overt Acts Related to Victim R.P.**

4 Overt Act No. 1: On November 30, 2021, defendant YAMIE caused
 5 to be created a shell company called Romehoun Sales using the
 6 synthetic identity of Jerome Calhoun.

7 Overt Act No. 2: On January 5, 2022, defendant YAMIE caused
 8 to be opened a JP Morgan Chase bank account ending in -9166 in the
 9 name of Romehoun Sales ("Romehoun Sales Chase account").

10 Overt Act No. 3: On September 12, 2022, defendant VERDZEKOV,
 11 defendant YAMIE, and their co-conspirators caused fraud victim R.P.
 12 to transfer approximately \$43,000 into the Romehoun Sales Chase
 13 account.

14 Overt Act No. 4: On September 12, 2022, defendant VERDZEKOV
 15 and defendant YAMIE exchanged a text message which discussed the
 16 funds stolen from victim R.P., which included images of a receipt
 17 from R.P.'s wire transfer and R.P.'s California driver's license.

18 Overt Act No. 5: On September 13, 2022, defendant YAMIE
 19 withdrew approximately \$3,000 from the Romehoun Sales Chase account,
 20 traceable at least in part to funds from fraud victim R.P.

21 **Overt Acts Related to Victims S.K. and L.K.**

22 Overt Act No. 6: On August 23, 2022, defendants VERDZEKOV and
 23 YAMIE exchanged a text message which included details about the
 24 synthetic identity of George Obeng, specifically, a photograph of a
 25 fake driver's license and passport from the Republic of Malawi
 26 bearing the name and purported date of birth for George Obeng.

27 Overt Act No. 7: On August 29, 2022, defendant VERDZEKOV and
 28 defendant YAMIE caused a Wells Fargo bank account ending in -9398 to

1 be opened under the synthetic identity of George Obeng ("Obeng Wells
2 Fargo account"), using the information on the fake Republic of Malawi
3 passport referred to in Overt Act No. 6.

4 Overt Act No. 8: On January 3, 2023, defendant VERDZEKOV and
5 his co-conspirators caused victims S.K. and L.K. to mail a \$90,000
6 cashier's check to a private mailbox located in Torrance, California.

7 Overt Act No. 9: On January 5, 2023, defendant VERDZEKOV
8 deposited the \$90,000 cashier's check from victims S.K. and L.K. into
9 the Obeng Wells Fargo account.

10 Overt Act No. 10: On January 26, 2023, defendant VERDZEKOV
11 sent defendant YAMIE a text message, stating in part "all my George
12 obeng [sic] accounts closed."

13 **Overt Acts Related to Victim J.G.**

14 Overt Act No. 11: On February 18, 2023, defendant CHE caused a
15 private mailbox located at 28364 South Western Avenue, Unit 457,
16 Palos Verdes, CA (the "Palos Verdes Mailbox") to be opened under the
17 synthetic identity of Roger Coffman.

18 Overt Act No. 12: On February 22, 2023, defendant CHE and his
19 co-conspirators caused victim J.G. to mail a \$63,750 cashier's check
20 to the Palos Verdes Mailbox.

21 Overt Act No. 13: On March 1, 2023, defendant YAMIE caused a
22 private mailbox located at 21213 Hawthorne Boulevard, Suite 5090,
23 Torrance, CA (the "Torrance Mailbox") to be opened under the
24 synthetic identity of George Campbell.

25 Overt Act No. 14: On March 3, 2023, defendant YAMIE and his
26 co-conspirators caused victim J.G. to mail a \$249,900 cashier's check
27 to the Torrance Mailbox.

28 Overt Act No. 15: On March 4, 2023, defendant VERDZEKOV sent

1 defendant YAMIE a text message with a photograph of the \$249,900
2 cashier's check referenced in Overt Act No. 14.

3 Overt Act No. 16: On March 4, 2023, after defendant VERDZEKOV
4 sent the photograph of J.G.'s \$249,900 cashier's check referenced in
5 Overt Act No. 15, defendant VERDZEKOV sent defendant YAMIE additional
6 text messages stating, "We need more mailboxes," and "Cuz checks
7 better than wires."

8 Overt Act No. 17: On March 4, 2023, defendant YAMIE sent
9 defendant VERDZEKOV text messages stating, "Far better" and "I'll get
10 more."

11 Overt Act No. 18: On March 6, 2023, co-conspirators caused a
12 \$5,200 cashier's check, traceable at least in part to funds from
13 fraud victim J.G., to be made out to Roger Coffman, a synthetic
14 identity used by defendant CHE.

15 Overt Act No. 19: On March 7, 2023, defendant YAMIE and his
16 co-conspirators caused victim J.G. to mail a \$249,960 cashier's check
17 to the Torrance Mailbox.

18 Overt Act No. 20: On or about March 8, 2023, defendant
19 VERDZEKOV sent defendant YAMIE a text message with a photograph of
20 victim J.G.'s \$249,960 cashier's check.

21 **Overt Acts Related to Victim A.B.**

22 Overt Act No. 21: On June 30, 2023, defendant YAMIE and his
23 co-conspirators caused victim A.B. to send signed, blank checks
24 associated with A.B.'s personal bank account to the synthetic
25 identity of Kevin Booker at a private mailbox located at 2768
Sepulveda Boulevard, Unit 18, Torrance, CA (the "Sepulveda Mailbox").

27 Overt Act No. 22: On July 10, 2023, defendant YAMIE deposited
28 a forged check for approximately \$55,330 drawn on the account

1 belonging to fraud victim A.B. into a Wells Fargo bank account ending
2 in -7759 in the name of shell company Fuasami Container Sales LLC.

3 Overt Act No. 23: On approximately July 13, 2023, defendant
4 YAMIE withdrew approximately \$8,000, traceable at least in part to
5 fraud proceeds from victim A.B., from a Wells Fargo bank account
6 ending in -7759 in the name of shell company Fuasami Container Sales
7 LLC.

8 **Overt Acts Related to Victim Business 1**

9 Overt Act No. 24: On March 20, 2023, defendant VERDZEKOV and
10 his co-conspirators caused Victim Business 1 to mail a \$124,021 check
11 to an address in Tarzana, California.

12 Overt Act No. 25: On April 18, 2023, defendant VERDZEKOV
13 deposited the \$124,021 check from Victim Business 1 to a Wells Fargo
14 bank account ending in -7668 in the name of victim W.K.

15 **Overt Acts Related to Victim Business 2**

16 Overt Act No. 26: On August 12, 2022, co-conspirators caused
17 to be opened a Wells Fargo bank account ending in -1121 in the name
18 of shell company Whiskey Distributors ("Whiskey Distributors Wells
19 Fargo account"), using the synthetic identity of Kevin Brown.

20 Overt Act No. 27: On December 19, 2022, defendant VERDZEKOV
21 and his co-conspirators caused Victim Business 2 to wire \$63,962 to
22 the Whiskey Distributors Wells Fargo account.

23 Overt Act No. 28: On December 19, 2022, defendant VERDZEKOV
24 withdrew approximately \$2,000 from the Whiskey Distributors Wells
25 Fargo account traceable at least in part to fraud proceeds from
26 Victim Business 2.

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1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 982]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States will seek
5 forfeiture as part of any sentence, pursuant to Title 18, United
6 States Code, Section 982(a)(1), in the event of any defendant's
7 conviction of the offense set forth in the sole Count of this
8 Indictment.

9 2. Any defendant, if so convicted, shall forfeit to the United
10 States of America the following:

11 (a) Any property, real or personal, involved in such
12 offense, and any property traceable to such property; and

13 (b) To the extent such property is not available for
14 forfeiture, a sum of money equal to the total value of the property
15 described in subparagraph (a).

16 3. Pursuant to Title 21, United States Code, Section 853(p),
17 as incorporated by Title 18, United States Code, Section 982(b)(1),
18 and Title 18, United States Code, Section 982(b)(2), the defendant,
19 if so convicted, shall forfeit substitute property, if, by any act or
20 omission of the defendant, the property described in the preceding
21 paragraph, or any portion thereof: (a) cannot be located upon the
22 exercise of due diligence; (b) has been transferred, sold to, or
23 deposited with a third party; (c) has been placed beyond the
24 jurisdiction of the court; (d) has been substantially diminished in
25 value; or (e) has been commingled with other property that cannot be
26 divided without difficulty. Substitution of assets shall not be
27 ordered, however, where the convicted defendant acted merely as an
28 intermediary who handled but did not retain the property in the

1 course of the money laundering offense unless the defendant, in
2 committing the offense or offenses giving rise to the forfeiture,
3 conducted three or more separate transactions involving a total of
4 \$100,000.00 or more in any twelve-month period.

5 A TRUE BILL
6

7 /S/
8 Foreperson

9 JOSEPH T. MCNALLY
10 Acting United States Attorney

11 

12 LINDSEY GREER DOTSON
13 Assistant United States Attorney
Chief, Criminal Division

14 KRISTEN A. WILLIAMS
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16 SCOTT PAETTY
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